

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: PHARMACEUTICAL
INDUSTRY AVERAGE WHOLESALE
PRICE LITIGATION

THIS DOCUMENT RELATES TO
ALL ACTIONS

MDL NO. 1456

CIVIL ACTION: 01-CV-12257-PBS

Judge Patti B. Saris

RECEIVED
AMC
BY
D

6/10/87
30 00
12/29/04 JH

ASSENTED TO MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to Rule 83.5.3 of the Local Rules of the United States District Court for the District of Massachusetts (the "Local Rules"), Baxter Healthcare Corporation and Baxter International Inc. ("Baxter") hereby moves this Court to grant that Tina Ducharme Reynolds, Esq., of Dickstein Shapiro Morin & Oshinsky LLP, 2101 L Street, N.W., Washington, DC 20037-1526, be admitted to appear on behalf of defendant Baxter and to practice before this Court in the above-entitled action. As grounds for this motion, the undersigned counsel respectfully represents the following:

1. Ms. Reynolds is and has been a member in good standing of the bars of the following Federal Courts:

United States Court of Appeals for the Federal Circuit 2001

U.S. Court of Federal Claims 2001

2. Ms. Reynolds is and has been a member in good standing of the bar of the District of Columbia since January 1998, and the bar of the State of North Carolina since August 1995;

3. There are no disciplinary proceedings pending against Ms. Reynolds as a member of the bar in any jurisdiction;

4. Ms. Reynolds has represented to the undersigned counsel that she is familiar with the Local Rules of the United States District Court for the District of Massachusetts; and

5. In further support of this motion, Ms. Reynolds has submitted herewith her Certificate of Good Standing as required by Local Rule 83.5.3 and, attached as Exhibit 1, a true and correct copy of my certificate of good standing from the District of Columbia.

WHEREFORE, the undersigned counsel respectfully moves Ms. Reynolds's admission to practice before this Court *pro hac vice*.

Respectfully submitted,



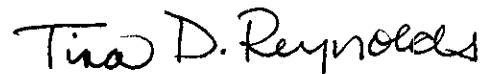
Peter E. Gelhaar, (BBO#: 188310)
DONNELLY, CONROY & GELHAAR, LLP
73 Tremont Street
Boston, MA 02108
(617) 720-2880

Dated: December 28, 2004

CERTIFICATE OF GOOD STANDING

Pursuant to Rule 83.5.3 of the Local Rules of the United States District Court for the District of Massachusetts, I, Tina Ducharme Reynolds, Esq., hereby certify that: (1) I am admitted to the bars of the Courts described in the foregoing motion; (2) I am a member of the bar in good standing in every jurisdiction where I have been admitted to practice; (3) No disciplinary proceedings are pending against me as a member of any bar in any jurisdiction; and (4) I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Respectfully submitted,



Tina Ducharme Reynolds, Esq.

Dated: December 17, 2004

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

Pursuant to Local Rule 7.1(A)(2), the undersigned certifies that counsel for defendants conferred with counsel for plaintiffs on this motion, and that counsel for plaintiffs assented to the motion.



Tina Ducharme Reynolds

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was delivered to all counsel of record by electronic service pursuant to Paragraph 11 of Case Management Order No. 2, by sending on December 29, 2004, a copy to Verilaw Technologies for posting and notification to all parties.



Tina Ducharme Reynolds